

Superfund Records Center

SITE: Nyanza

BREAK: 60.01

OTHER: 34460

# NYANZA CHEMICAL WASTE DUMP

## NPL Site Administrative Record

### INDEX

*RED = 9/4/85*

Prepared for

Region I  
Waste Management Division  
U.S. Environmental Protection Agency

With Assistance from

EBASCO SERVICES, INC.  
211 Congress Street, Boston, Massachusetts 02110

## INTRODUCTION

This document is the Index to the Administrative Record for the Nyanza Chemical Waste Dump National Priorities List (NPL) Site - 1985 Record of Decision. Section I of the Index cites site-specific documents, and Section II cites guidance documents used by EPA staff in selecting a response action at the site.

The Administrative Record is available for public review at EPA Region I's office in Boston, Massachusetts, and at the Ashland Public Library, 66 Front Street, Ashland, Massachusetts, 01721. Questions concerning the Administrative Record should be addressed to the EPA Region I site manager.

The Administrative Record is required by the Comprehensive, Environmental, Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

**Section I**  
**Site-Specific Documents**

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**ADMINISTRATIVE RECORD INDEX  
for the  
Nyanza Chemical Waste Dump NPL Site**

1.0 Pre-Remedial

1.2 Preliminary Assessment

1. Cross-Reference: Memorandum from John Fitzgerald, Massachusetts Department of Environmental Quality Engineering to File (March 27, 1981). Concerning Phase I field testing at the Nyanza Chemical Waste Dump in Ashland, Massachusetts. [Filed and cited as entry number 3 in 17.8 State and Local Technical Records].
2. Cross-Reference: Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (May 8, 1981). Concerning additional materials to assist the DEQE in evaluation of the screened testing list. [Filed and cited as entry number 4 in 17.8 State and Local Technical Records].
3. Cross-Reference: Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to William St. Hilaire, Massachusetts Department of Environmental Quality Engineering (February 12, 1982). Concerning comments on DEQE's draft approval of the deep drilling program for the Nyanza site. [Filed and cited as entry number 8 in 17.8 State and Local Technical Records].
4. Memorandum from Mary Sanderson, EPA Region I to John Hackler, EPA Region I (March 4, 1982). Concerning comments on DEQE's draft approval for a hydrogeologic investigation and monitoring program at the Nyanza site.
5. Cross-Reference: Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to Mary Sanderson, EPA Region I (March 18, 1982). Concerning transmittal of attached draft report entitled "Pollution Evaluation During the Low Water Table Season on the Nyanza Chemical Waste Dump, Ashland, Mass.," Carr Research Laboratory, Inc. and Connorstone, Inc. for MCL Development Corporation. (March 3, 1982). [Filed and cited as entry number 9 in 17.8 State and Local Technical Records].

## 1.2 Preliminary Assessment (continued)

6. Cross-Reference: Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (May 6, 1982). Concerning issues regarding field techniques used by Carr Research Laboratory, Inc. [Filed and cited as entry number 10 in 17.8 State and Local Technical Records].
7. Cross-Reference: Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (December 20, 1982). Concerning quality control at the Nyanza site. [Filed and cited as entry number 12 in 17.8 State and Local Technical Records].

### Reports

8. "An Investigation of Mercury Problems in Massachusetts," JBF Scientific Corporation for Massachusetts Water Resources Commission, Division of Water Pollution Control (July 3, 1973).
9. "Potential Hazardous Waste Site Identification and Preliminary Assessment," EPA Region I (May 1, 1980).
10. Cross-Reference: "Nyanza, Chemical Waste Dump, Megunco Road, Ashland, Massachusetts, Preliminary Site Assessment Report," Massachusetts Department of Environmental Quality Engineering (October 23, 1980). [Filed and cited as Attachment VI of entry number 1 in 5.4 Record of Decision (ROD)]. [Note: Appendix B is missing]
11. "On-Site Hydrogeology and Initial Pollutant Studies on the Nyanza Chemical Waste Dump - Ashland, Mass.," Carr Research Laboratory, Inc. and Connorstone, Inc. (August 14, 1981). (NOTE: includes oversized Plates No. 2 and No. 3 that may be reviewed at EPA Region I, Boston, Massachusetts). [Note: Appendix C is missing.]
12. Cross-Reference: "Discussion Document - Research Options on Wide Area Mercury and Selenium Pollution Near the Nyanza Chemical Waste Dump, Ashland, Massachusetts," Carr Research Laboratory, Inc. (February 5, 1982). [Filed and cited as number 7 in 17.8 State and Local Technical Records].

## 1.2 Preliminary Assessment (continued)

### Reports (continued)

13. Cross-Reference: "Nyanza Chemical Waste Dump, Ashland, Massachusetts - Discussion Document," John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (August 6, 1982). Concerning quality control at the Nyanza site. [Filed and cited as entry number 11 in 17.8 State and Local Technical Records].

## 1.3 Site Inspection

1. Memorandum from Mary C. Sanderson, EPA Region I to File (October 27, 1981). Concerning a summary of the Site Inspection of the Nyanza/Ashland Site on October 22, 1981.
2. Memorandum from Mary C. Sanderson, EPA Region I to File (November 16, 1981). Concerning a summary of the Site Inspection of the Nyanza/Ashland Site on November 12, 1981.
3. "Potential Hazardous Waste Site, Site Inspection Report," EPA Region I (November 20, 1981).

## 2.0 Removal Response

### 2.1 Correspondence

1. Cross-Reference: Letter from Richard J. Chalpin, Massachusetts Department of Environmental Quality Engineering to Donald Weld, Ashland Resident (December 10, 1984). Concerning soil removal at 55 Tilton Avenue, Ashland, Massachusetts. [Filed and cited as entry number 2 in 3.1 Remedial Investigation Correspondence].

## 3.0 Remedial Investigation (RI)

### 3.1 Correspondence

1. Letter from Richard J. Chalpin, Massachusetts Department of Environmental Quality Engineering to Ben Montenegro, Ashland Highway Department (December 10, 1984). Concerning sediment/soils sampling at 55 Tilton Avenue, Ashland, Massachusetts.

### 3.1 Correspondence (continued)

2. Letter from Richard J. Chalpin, Massachusetts Department of Environmental Quality Engineering to Donald Weld, Ashland Resident (December 10, 1984). Concerning soil removal at 55 Tilton Avenue, Ashland, Massachusetts.
3. Letter from Holly Guy Buckoski, Federated Church of Ashland to Dennis Gagne and Richard Cavagnero, EPA Region I (February 25, 1985). Concerning questions and concerns regarding contaminants from the Nyanza site that have been detected at 55 Tilton Avenue, Ashland, Massachusetts.
4. Letter from Donald Senovich, NUS Corporation to Dennis Gagne, EPA Region I (March 12, 1985). Concerning submittal of Draft Phase I Remedial Investigation/Feasibility Study Report.
5. Letter from Richard Cavagnero, EPA Region I to the Board of Selectmen, Town of Ashland (March 27, 1985). Concerning transmittal of the Phase I Remedial Investigation/Feasibility Study Report on the Nyanza site.
6. Letter from Richard Cavagnero, EPA Region I to the Board of Health, Town of Ashland (March 27, 1985). Concerning transmittal of the Phase I Remedial Investigation/Feasibility Study Report on the Nyanza site.
7. Letter from Richard Cavagnero, EPA Region I to Joseph Lurie, Nyacol Products, Inc. (March 27, 1985). Concerning transmittal of the Phase I Remedial Investigation/Feasibility Study Report on the Nyanza site.
8. Letter from Richard Cavagnero, EPA Region I to Robert Gayner, MCL Development Corporation (March 27, 1985). Concerning transmittal of the Phase I Remedial Investigation/Feasibility Study Report on the Nyanza site.
9. Letter from Richard A. Cavagnero, EPA Region I to Holly Guy Buckoski, Federated Church of Ashland (March 28, 1985). Concerning response to Holly Guy Buckoski's letter of February 25, 1985.
10. Memorandum from Richard Van Tassel, NUS Corporation to D. Senovich, et al., Superfund Division, NUS Corporation (April 4, 1985). Concerning the lack of site data necessary to complete the Phase II RI/FS and a summary of data gaps and comments on how these impact the Phase I and II RI/FS's.

### 3.1 Correspondence (continued)

11. Memorandum from Richard Van Tassel, NUS Corporation to D. Senovich, et al., Superfund Division, NUS Corporation (April 16, 1985). Concerning EPA's requested letter addendum for the Phase I RI/FS in which responses to their comments would be summarized.
12. Letter from John F. Hackler, EPA Region I to George Latulippe, NUS Corporation (April 18, 1985). Concerning EPA's concerns that NUS immediately address several major shortcomings of the Phase I Feasibility Study.
13. Letter from Theresa and Donald Weld, Ashland Residents to Office of Public Affairs, EPA Region I (April 20, 1985). Concerning problems regarding chemicals found in the basement of the Weld home at 55 Tilton Avenue, Ashland, Massachusetts.
14. Letter from Richard L. Van Tassel and George Latulippe, NUS Corporation to Richard Cavagnero, EPA Region I (April 26, 1985). Concerning transmittal of the Draft Addendum to the Phase I Remedial Investigation and Feasibility Study.
15. Letter from Richard Cavagnero, EPA Region I to the Chairman of the Board of Health, Town of Ashland (April 30, 1985). Concerning transmittal of an Addendum to the Phase I Feasibility Study for the Nyanza Chemical Site in Ashland, Massachusetts.
16. Letter from Debra Prybla, EPA Region I to the Head Librarian, Ashland Public Library (April 30, 1985). Concerning transmittal of an Addendum to the Remedial Investigation and Feasibility Study for the Nyanza Superfund site.
17. Cross-Reference: Comments from James C. Colman, Massachusetts Department of Environmental Quality Engineering to Merrill Hohmann, EPA Region I (May 20, 1985). Concerning comments on the March 1985 Draft Phase I RI/FS and the April 1985 Addendum. [Filed and cited in number 9 in 3.6 Remedial Investigation (RI) Reports].

### 3.2 Sampling and Analysis Data

- \* Sampling and Analysis Data for the Remedial Investigation may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.



### 3.4 Interim Deliverables

#### Reports

1. "Final Remedial Action Master Plan For Nyanza Chemical Waste Site, Ashland, MA," Camp, Dresser & McKee Inc. (September 23, 1982).

#### Comments

2. Letter from Jerome B. Carr, PhD., Carr Research Laboratory, Inc. to Lauren Stiller Rikleen, EPA Region I (August 5, 1982) with attached "Evaluation of the Draft Remedial Action Master Plan," signed by Dr. Carr and George Connors, Connorstone Inc.
3. Letter from Karen M. Pierson, Metropolitan Area Planning Council to Lauren Rikleen, EPA Region I (August 17, 1982) with attached memo from Ms. Pierson to Ed Bates, Town of Ashland Selectman. Concerning "Preliminary Review of Nyanza Working Draft," (August 12, 1982).

#### Responses to Comments

4. Letter from Brendan M. Harley, Camp, Dresser & McKee Inc. to Dennis P. Gagne, EPA Region I (September 20, 1982) with attached response to statements by Messrs. Jerome Carr and George Connors on August 5, 1982. Concerning the Remedial Action Master Plan.
5. Letter from Dennis P. Gagne, EPA Region I to Robert Gayner, MCL Development Corporation (September 24, 1982) with attached letter and statements made by Messrs. Jerome Carr and George Connors concerning the Remedial Action Master Plan.

### 3.6 Remedial Investigation (RI) Reports

#### Reports

1. "Draft Phase I Remedial Investigation /Feasibility Study Report - Volumes I, IA, and II," NUS Corporation (March 1985).
2. "Addendum to Phase I Remedial Investigation/ Feasibility Study - Nyanza Chemical Site, Middlesex County, Massachusetts," NUS Corporation (April 1985). [via transmittal letter from Richard L. Van Tassel and George J. Latulippe, NUS Corporation to Richard Cavagnero, EPA Region I (April 26, 1985)].

### 3.6 Remedial Investigation (RI) Reports (continued)

3. "Report of Field Work Completed," Camp Dresser & McKee, Inc. (July 1985). [Via transmittal letter from Arthur L. Quaglieri and Richard J. Hughto, Camp Dresser & McKee, Inc. to Dennis P. Gagne and Richard Cavagnero, EPA Region I (July 16, 1985)].
- \* The previous report contains oversized maps, available for review, by appointment only at EPA Region I, Boston, Massachusetts.

#### Comments

4. Comments Dated March 15, 1985 from Don Porteous, EPA Region I on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," NUS Corporation.
5. Comments Dated April 3, 1985 from Georgi A. Jones, Superfund Implementation Group, U.S. Department of Health and Human Services on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," NUS Corporation.
6. Comments Dated April 17, 1985 from S.L. Carlock, Omaha District Corps of Engineers, Department of the Army on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," NUS Corporation.
7. Letter from Richard Brown, et al., Ashland Advocates for a Clean Environment to Richard Cavagnero, EPA Region I (May 9, 1985). With the attached letter from Stephen U. Lester, Citizen's Clearinghouse for Hazardous Wastes, Inc. to Laura Kelly, Ashland Advocates for a Clean Environment (May 9, 1985). Concerning review of Phase I RI/FS.
8. Comments Dated May 14, 1985 from Ashland Advocates for a Clean Environment on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," NUS Corporation.
9. Comments Dated May 20, 1985 from James C. Colman, Massachusetts Department of Environmental Quality Engineering on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," and the April 1985 "Addendum to Phase I Remedial Investigation/ Feasibility Study - Nyanza Chemical Site, Middlesex County, Massachusetts," NUS Corporation.

### 3.6 Remedial Investigation (RI) Reports (continued)

#### Comments (continued)

10. Comments dated June 7, 1985 from Sanford M. Matathia, Rackemann, Sawyer & Brewster (Attorney for the Ashland Board of Health) to Richard Cavagnero, EPA Region I on the March 1985 "Draft Phase I Remedial Investigation/Feasibility Study Report," NUS Corporation.
11. Letter from Richard Brown, et al., Members of AACE Executive Committee, Federated Church of Ashland to Michael Deland, EPA Region I (June 18, 1985). Concerning issues discussed at meeting of several community groups on June 14, 1985.

### 3.7 Work Plans and Progress Reports

1. "Work Plan - Remedial Investigation/ Feasibility Study of Alternatives - Nyanza Site, Ashland, Massachusetts," NUS Corporation (March 1983).
2. "Task 13 (Drilling and Testpitting) Work Plan for the Nyanza Chemical Site, Ashland, Massachusetts," NUS Corporation (September 26, 1983).

### 3.9 Health Assessments

1. Memorandum from Georgi A. Jones, Department of Health and Human Services to John E. Figler, EPA Region I (May 12, 1983). Concerning review of sampling data collected at the Nyanza Chemical site, Ashland, Massachusetts.
2. Memorandum from Karen Reed, Massachusetts Department of Environmental Quality Engineering to Bruce K. Maillet, Massachusetts Department of Environmental Quality Engineering (July 27, 1983). Concerning the analysis for the presence of mercury at the Nyanza site.
3. Memorandum from Carol Rowan, Massachusetts Department of Environmental Quality Engineering to Bob Bois, Massachusetts Department of Environmental Quality Engineering (July 29, 1983). Concerning mercury detection in the air at the Nyanza Waste Site.
4. Memorandum from Georgi A. Jones, U.S. Department of Health and Human Services to John Figler, EPA Region I (August 9, 1983). Concerning Center for Disease Control's review of the summer sampling data from the Nyanza site.

### 3.9 Health Assessments (continued)

5. Memorandum from Dennis Gagne, EPA Region I to John Figler, EPA Region I (September 4, 1984). Concerning additional Center for Disease Control comments on the sampling data submitted for review from the Nyanza site.

### 3.12 Action Memoranda

1. Memorandum from Merrill S. Hohman, EPA Region I to William N. Hedeman, USEPA (October 28, 1982) with attached "Action Memorandum for Authorization to Proceed with Remedial Planning Activities at the Nyanza Superfund Site in Ashland, Massachusetts." (The Enforcement Section of the Memorandum is Withheld as CONFIDENTIAL).
2. "Action Memorandum for Authorization to Proceed with Remedial Planning Activities at the Nyanza Superfund Site in Ashland, Massachusetts," from William N. Hedeman, Jr., USEPA to Rita Lavelle, USEPA (December 6, 1982). (The Enforcement Section of the Memorandum is Withheld as CONFIDENTIAL).

## 4.0 Feasibility Study (FS)

### 4.1 Correspondence

1. Cross-Reference: Internal memorandum from Don Porteous, to Matt Schweisberg, EPA Region I (March 15, 1985). [Filed and cited as entry number 1 in section 5.4, Attachment III of the Record of Decision (ROD)].
2. Internal memorandum from Margaret Leshen to Richard Cavagnero, EPA Region I (April 8, 1985). Concerning the applicability of only two of the proposed remedial alternatives in relation to the applicable and relevant RCRA standards.
3. Letter from the Honorable David P. Magnani, Commonwealth of Massachusetts House of Representatives to Michael Deland, EPA Region I (May 9, 1985). Concerning attached questions submitted by the Ashland Board of Health, requests for re-evaluation of the Draft RI/FS, data analysis and financing.

#### 4.1 Correspondence (continued)

4. Cross-Reference: Letter from Richard Brown, et al., Members of AACE Executive Committee, Federated Church of Ashland to Michael Deland, EPA Region I (June 18, 1985). Concerning issues discussed at meeting of several community groups on June 14, 1985. [Filed and cited as entry number 11 in 3.6 Remedial Investigation (RI) Reports].

#### 4.6 Feasibility Study (FS) Reports

##### Reports

1. Cross-Reference: "Draft Phase I Remedial Investigation/Feasibility Study Report - Volumes I, IA, and II," NUS Corporation (March 1985). [Filed and cited as entry number 1 in 3.6 Remedial Investigation (RI) Reports].
2. Cross-Reference: "Addendum to Phase I Remedial Investigation/Feasibility Study - Nyanza Chemical Site, Middlesex County, Massachusetts," NUS Corporation (April 1985). [Filed and cited as entry number 2 in 3.6 Remedial Investigation (RI) Reports].
3. Cross-Reference: Comments on the March 1985 "Draft Phase I Remedial Investigation/ Feasibility Study Report - Volumes I, IA, and II," and the April 1985 "Addendum to Phase I Remedial Investigation/ Feasibility Study - Nyanza Chemical Site, Middlesex County, Massachusetts," NUS Corporation are filed and cited as entries numbered 4-11 in 3.6 Remedial Investigation (RI) Reports.
- \* Comments on the Feasibility Study received by EPA Region I are summarized in the Responsiveness Summary, which is Attachment I of the Record of Decision (ROD). The ROD is filed and cited as entry number 1 in 5.4 Record of Decision (ROD).

## 5.0 Record of Decision (ROD)

### 5.1 Correspondence

1. Letter from Maureen A. Bengiovanni, Mary G. Heaton, Maureen D. Lavin, Ashland Board of Health to the Honorable Carol Amicks, Massachusetts House of Representatives (April 30, 1985). Concerning the need for immediate steps towards effecting a Superfund financed clean-up and the necessity of strong advocacy on the part of the Representatives.
2. Cross-Reference: Letter from Richard Brown, et al., Ashland Advocates for a Clean Environment to Richard Cavagnero, EPA Region I (May 9, 1985). With the attached letter from Stephen U. Lester, Citizen's Clearinghouse for Hazardous Wastes, Inc. to Laura Kelly, Ashland Advocates for a Clean Environment (May 9, 1985). Concerning review of Phase I RI/FS. [Filed and cited as entry number 7 in section 3.6]
3. Cross-Reference: Letter from Sanford M. Matathia, Rackemann, Sawyer & Brewster (attorney for Ashland Board of Health) to Richard Cavagnero, EPA Region I (May 10, 1985). [Filed and cited as entry number 11 in section 13.1].
4. Letter from Richard Brown, et al., Ashland Advocates for a Clean Environment (AACE) to Michael Deland, EPA Region I (August 8, 1985). Concerning the apprehension among residents that the remedial alternative chosen in the Draft ROD does not meet cleanup needs.
5. Letter from Mary G. Heaton, Ashland Board of Health, Laura Kelly, Ashland Advocates for a Clean Environment, and Edward G. Bates, Jr., Ashland Board of Selectmen to Lee M. Thomas, EPA Headquarters (August 14, 1985). Concerning remedial action at the Nyanza Chemical Waste Dump.
6. Letter from Michael R. Deland, EPA Region I to Mary G. Heaton, Ashland Board of Health (September 19, 1985). Concerning EPA's response to Ms. Heaton's letter of August 14, 1985 regarding EPA's selection of a remedial action alternative at the Nyanza site.

## 5.2 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Letter from S. Russell Sylva, Massachusetts Department of Environmental Quality Engineering to Michael Deland, EPA Region I (September 3, 1985). Concerning State's comments on Phase I Remedial Action for the Nyanza Superfund site.

## 5.3 Responsiveness Summaries

1. Cross-Reference: Responsiveness Summary is Attachment I of the Record of Decision [Filed and cited as entry number 1 in 5.4 Record of Decision (ROD)].

## 5.4 Record of Decision (ROD)

1. "Record of Decision - Remedial Alternative Selection - Nyanza Chemical Waste Dump Site, Ashland, MA," EPA Region I (September 4, 1985). [Note: Attachment VI is missing Appendix B]
- \* Attachment V of the Record of Decision contains oversized maps, and may be reviewed by appointment only at EPA Region I, Boston, Massachusetts.

## 9.0 State Coordination

### 9.1 Correspondence

1. Memorandum from William N. Hedeman, USEPA to Rita Lavelle, USEPA (January 11, 1983). Concerning the Superfund State Contract for the Nyanza Site, Massachusetts.

### 9.3 EPA/State Contracts

1. "Superfund State Contract Between the Commonwealth of Massachusetts and the U.S. Environmental Protection Agency for Remedial Activities Related to the Nyanza Site, Ashland, MA, Middlesex County, Massachusetts" Rita M. Lavelle, USEPA and Anthony D. Cortese, Massachusetts Department of Environmental Quality Engineering (January 20, 1983).

#### 9.4 Status of State Assurances

1. Letter from Anthony D. Cortese, Massachusetts Department of Environmental Quality Engineering to Lester A. Sutton, EPA Region I (October 14, 1982). Concerning Nyanza Hazardous Waste Site State Contract and CERCLA Assurances.

#### 10.0 Enforcement

##### 10.1 Correspondence

1. Letter from Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control to the Nyanza Chemical Company (August 14, 1967). Concerning the implementation of the Pollution Abatement Program.
2. Cross-Reference: Telegram from John B. Casazza, Massachusetts Water Resources Commission, Division of Water Pollution Control to Dr. Robert M. Lurie, Nyanza Inc. (October 6, 1971). Concerning Order to cease and desist discharges before October 12, 1971. [Filed and cited as entry number 1, in 10.3 State and Local Enforcement Records].
3. Letter from Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control to Dr. Roland E. Derby, Jr., Nyanza, Inc. (August 8, 1972). Concerning review of the engineering report on Pollution Control prepared by R.E. Runels Construction Company, Inc..
4. Letter from Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control to Dr. Roland E. Derby, Jr., Nyanza, Inc. (October 30, 1972). Concerning review of letter report of September 25, 1972 as a supplement to the engineering report dated June 15, 1972.
5. Letter from Frank Faticanti, Nyanza, Inc. to Clement H. Moran, Nyanza Chemical Co. (November 30, 1972). Concerning transmittal of report on the status of potentially odor-causing chemical vapors at the Ashland facility.
6. Cross-Reference: Letter from Paul T. Anderson, Commonwealth of Massachusetts Department of Public Health to C. Noran, Nyanza, Inc. (December 7, 1972). [Filed and cited as entry number 2 in 10.3 State and Local Enforcement Records].



10.1 Correspondence (continued)

7. Letter from A.C. Hayes, Massachusetts Metropolitan District Commission, Sewerage Division to Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control (February 26, 1973). Concerning comments on the Camp, Dresser & McKee, Inc. engineering report on the proposed pretreatment system.
8. Letter from Henry G. Dickinson, Ashland Board of Public Works to Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control (March 22, 1973). Concerning comments on the Camp, Dresser & McKee, Inc. engineering report on the proposed pretreatment system.
9. Letter from A.C. Hayes, Massachusetts Metropolitan District Commission, Sewerage Division to Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control (June 14, 1973). Concerning comments on the addendum to the Camp, Dresser & McKee, Inc. engineering report.
10. Letter from Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control to Dr. Robert N. Lurie, Nyanza, Inc. (June 27, 1973). Concerning comments from The Massachusetts Division of Water Pollution Control and The Metropolitan District Commission on the Camp, Dresser & McKee, Inc. engineering report dated January 19, 1973.
11. Letter from John M. Reed, Withington, Cross, Park & Groden (Attorney for Nyanza, Inc.) to Thomas C. McMahon, Water Resources Commission, Division of Water Pollution Control (October 29, 1973). Concerning Nyanza, Inc.'s lack of consent to the Division of Water Pollution Control's Order, Docket No. 505 on October 1, 1973.
12. Letter from Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution Control to Attorney General Francis X. Bellotti, Massachusetts State House (November 14, 1975). Concerning request for contempt proceedings against Nyanza, Inc. for violations of the interlocutory order.

10.3 State and Local Enforcement Records

1. Telegram from John B. Casazza, Massachusetts Water Resources Commission, Division of Water Pollution Control to Dr. Robert M. Lurie, Nyanza Inc. (October 6, 1971). Concerning Order to cease and desist discharges before October 12, 1971.
2. Letter from Paul T. Anderson, Commonwealth of Massachusetts Department of Public Health to C. Moran, Nyanza, Inc. (December 7, 1972). Concerning notification of violation of regulations.
3. Commonwealth of Massachusetts Water Resources Commission Order, In the Matter of Nyanza, Inc., Docket No. 505 (October 1, 1973).
4. Commonwealth of Massachusetts Water Resources Commission Amended Order, In the Matter of Nyanza, Inc., Docket No. 505 (January 24, 1974).

10.9 Pleadings

1. Affidavit of Frank Robinson, Thomas C. McMahon, as he is the Director of the Division of Water Pollution Control v. Nyanza, Inc., Commonwealth of Massachusetts Superior Court, Civil Action No. 1977.
2. Stipulation of Commonwealth of Massachusetts, Thomas C. McMahon, Director Division of Water Pollution Control v. Nyanza, Inc., Commonwealth of Massachusetts Superior Court, Civil Action No. 1977.
3. Interlocutory Order, Commonwealth of Massachusetts Thomas C. McMahon v. Nyanza, Inc., Civil Action No. 1977 (September 27, 1974).
4. Findings and Orders, Thomas C. McMahon, Director Division of Water Pollution Control, Plaintiff v. Nyanza, Inc., Defendant, Civil Action No. 1977 (February 18, 1977) [via transmittal letter from Catherine L. Farrell, Commonwealth of Massachusetts Department of the Attorney General to Thomas C. McMahon, Massachusetts Water Resources Commission, Division of Water Pollution (March 1, 1977)].

## 11.0 Potentially Responsible Party

### 11.9 PRP-Specific Correspondence

#### ASHLAND REALTY DEVELOPMENT CORPORATION

1. Letter from William A. Sullivan, Jr., EPA Region I to Ashland Development Realty Corporation (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

#### MR. JOHN P. BAUM

2. Letter from William A. Sullivan, Jr., EPA Region I to Mr. John P. Baum (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

#### MR. EDWARD B. BELL, JR.

3. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Edward B. Bell, Jr. (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

#### BELMAR, INCORPORATED

4. Letter from William A. Sullivan, Jr., EPA Region I to J. Belmar, Incorporated (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

#### MR. AND MRS. EDWARD CAMILLE

5. Letter from William F. Cass, Massachusetts Department of Environmental Quality Engineering, Division of Hazardous Waste to Edward Camille, property owner of the former Nyanza Chemical Corporation site (March 27, 1980). Concerning the Department of Environmental Quality Engineering's investigation of the Nyanza property.
6. Letter from William A. Sullivan, Jr., EPA Region I to Mr. and Mrs. Camille, property owner of the former Nyanza Chemical Corporation site (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

11.9 PRP-Specific Correspondence (continued)

MS. MARY E. CUNIO

7. Letter from William A. Sullivan, Jr., EPA Region I to Ms. Mary E. Cunio (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. ROLAND E. DERBY, JR.

8. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Roland E. Derby, Jr. (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. ROBERT E. GAYNER

9. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Robert E. Gayner (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.
10. Letter from Edward Z. Pollack (Attorney for Robert E. Gayner) to Lauren Stiller Rikleen, EPA Region I (April 13, 1982). Concerning response to EPA Notice of Potential Liability.
11. Letter from Dennis P. Gagne, EPA Region I to Robert Gayner, MCL Development Corporation (October 24, 1984). Concerning transmittal of the Draft Remedial Investigation Report for review and comment.
12. Letter from John Hackler, EPA Region I to Robert Gayner, MCL Development Corporation (December 28, 1984). Concerning comments regarding an earlier telephone conversation.

MR. GEORGE E. LEARY

13. Letter from William A. Sullivan, Jr., EPA Region I to Mr. George E. Leary (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

## 11.9 PRP-Specific Correspondence (continued)

### JAMES L. LEFTER AND NELSON W. HOLDEN

14. Letter from James L. Lefter and Nelson W. Holden, Middlesex Equipment Company to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (August 19, 1982). Concerning the proposed expansion in operations at the Middlesex Equipment Company.
15. Letter from Edward H. MacDonald, Massachusetts Department of Environmental Quality Engineering to James L. Lefter and Nelson W. Holden, Middlesex Equipment Company (September 21, 1982). Concerning acknowledgement and response to James L. Lefter and Nelson W. Holden's letter of August 19, 1982.

### MR. ROBERT M. LURIE

16. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Robert M. Lurie (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

### MR. JOSEPH LURIE

17. Letter from Dennis P. Gagne, EPA Region I to Joseph Lurie, Nyacol Products, Inc. (October 24, 1984). Concerning transmittal of the Draft Remedial Investigation Report for review and comment.

### MR. EDWARD M. LYNCH, JR.

18. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Edward M. Lynch, Jr. (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

### MCL DEVELOPMENT CORPORATION

19. Letter from William A. Sullivan, Jr., EPA Region I to MCL Development Corporation (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

### NYACOL PRODUCTS, INC.

20. Letter from William A. Sullivan, Jr., EPA Region I to Nyacol Products, Inc. (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

11.9 PRP-Specific Correspondence (continued)

) NYACOL PRODUCTS, INC. (continued)

21. Letter from Robert C. Davis, Goulston & Storrs (Attorney for Nyacol Products, Inc.) to Lauren Stiller Rikleen, EPA Region I (March 19, 1982). Concerning response to EPA Notice of Potential Liability stating that Nyacol Products, Inc. is not a responsible party.

NYANZA INCORPORATED

22. Letter from William A. Sullivan, Jr., EPA Region I to Nyanza Incorporated (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. THOMAS L. O'CONNER

23. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Thomas L. O'Conner (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. EARL A. PIKE, JR.

24. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Earl A. Pike, Jr. (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. THOMAS W. SHOESMITH

25. Letter from William A. Sullivan, Jr., EPA Region I to Mr. Thomas W. Shoesmith (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

MR. GEORGE W. SPICER

26. Letter from William A. Sullivan, Jr., EPA Region I to Mr. George W. Spicer (March 4, 1982). Concerning notification of Potentially Responsible Party status with respect to the Nyanza, Incorporated site in Ashland, Massachusetts.

## 13.0 Community Relations

### 13.1 Correspondence

1. Letter from William J. St. Hilaire, Massachusetts Department of Environmental Quality Engineering to Maureen D. Lavin, Ashland Board of Health (September 21, 1982). Concerning a moratorium on building or new housing at the Nyanza Site.
2. Letter from Dennis P. Gagne, EPA Region I to Maureen D. Lavin, Ashland Board of Health (October 7, 1982). Concerning transmittal of the final Remedial Action Master Plan (RAMP).
3. Letter from Dennis P. Gagne, EPA Region I to the Chairman, Ashland Board of Selectmen (October 7, 1982). Concerning transmittal of the final Remedial Action Master Plan (RAMP).
4. Letter from Dennis P. Gagne, EPA Region I to Martin Buckoski, Ashland Advocates for a Clean Environment (October 14, 1982). Concerning transmittal of the final Remedial Action Master Plan (RAMP).
5. Letter from Dennis P. Gagne, EPA Region I to Head Librarian, Ashland Public Library (October 14, 1982). Concerning transmittal of the final Remedial Action Master Plan (RAMP).
6. Letter from Dennis P. Gagne, EPA Region I to Mary Heaton, Ashland Board of Health (September 8, 1983). Concerning the EPA investigation of airborne mercury and organics at the Nyanza site on June 22, 1983.
7. Letter from Dennis P. Gagne, EPA Region I to Holly Buckoski, Ashland Resident (September 8, 1983). Concerning the EPA investigation of airborne mercury and organics at the Nyanza site on June 22, 1983.
8. Letter from Dennis P. Gagne, EPA Region I to Rocco Annesi, Ashland Board of Selectmen (September 8, 1983). Concerning the EPA investigation of airborne mercury and organics at the Nyanza site on June 22, 1983.
9. Letter from Wayne D. Buckley, Ashland resident to Richard Cavagnero, EPA Region I (April 19, 1985). Concerning his resentment over the resolution of the Nyanza site.
10. Letter from J.T. Robinson, Nyacol Products Inc. to Merrill Hohman, EPA Region I (May 9, 1985). Concerning the adverse impacts that cleanup alternatives may have on day to day manufacturing operations and possible detrimental effects on employees.

### 13.1 Correspondence (continued)

11. Letter from Sanford M. Matathia, Rackemann, Sawyer & Brewster (attorney for Ashland Board of Health) to Richard Cavagnero, EPA Region I (May 10, 1985). Concerning submittal of comments on the Draft Phase I Remedial Investigation/Feasibility Study.
12. Letter from David Hatch Jr., Ashland resident to Richard Cavagnero, EPA Region I. Concerning the possibility of total excavation (option #5), and long term cost effectiveness.

### 13.2 Community Relations Plan

1. "Community Relations Plan - Nyanza Site, Ashland, Massachusetts," EPA Region I (January 26, 1983). (CONFIDENTIAL BUSINESS INFORMATION REDACTED).

### 13.3 News Clippings/Press Releases

- \* News Clippings regarding the Nyanza Chemical Superfund Site may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.

#### Press Releases

1. Notice of public meeting to be held April 10, 1985, EPA Region I, with attached, "Source Control Feasibility Study Summary - Nyanza Chemical Site, Ashland, Massachusetts," EPA Region I (April 1985).
2. "EPA Environmental News" Cleanup Plan for Nyanza Superfund Site Announced, "EPA Region I (September 4, 1985).

### 13.4 Public Meetings

1. Transcript, Source-Control Feasibility Study Public Hearing for the Nyanza Chemical Site, Ashland, Massachusetts (April 18, 1985).

### 13.5 Fact Sheets

1. "Source Control Feasibility Study Summary - Nyanza Chemical Site, Ashland, Massachusetts," EPA Region I (April 1985).
2. "Superfund Program Fact Sheet - Nyanza Chemical Site, Ashland, Massachusetts," EPA Region I (September 1985).



## 14.0 Congressional Relations

### 14.1 Correspondence

1. Cross-Reference: Letter from the Honorable David P. Magnani, Commonwealth of Massachusetts House of Representatives to Michael Deland, EPA Region I (May 9, 1985). [Filed and cited as entry number 3 in section 4.1].
2. Letter from the Honorable Barney Frank, Member of Congress to Michael R. Deland, EPA Region I (June 14, 1985). Concerning Representative Frank's recommendation to review documents from local community groups and to proceed toward remedial action as soon as possible.
3. Letter from Michael Deland, EPA Region I to the Honorable Barney Frank, US House of Representatives (July 26, 1985). Concerning response to letter from Representative Frank dated June 14, 1985.

## 17.0 Site Management Records

### 17.4 Site Photographs/Maps

1. Memorandum from Thomas R. Osberg, USEPA, Environmental Photographic Interpretation Center to Dennis Gagne, EPA Region I (November 3, 1982). Concerning transmittal of report entitled "Nyanza Hazardous Waste Site Ashland, Massachusetts; PIC# 82063, November 1982," a photographic analysis of the site.
- \* Photographs and Maps for the Nyanza Chemical Hazardous Waste Site may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.

### 17.8 State and Local Technical Records

1. "Proposal for Compliance Program and Schedule, Nyanza Chemical Waste Dump, Ashland, Mass.," Connorstone Inc. and Carr Research Laboratory, Inc. for MCL Development Corporation (February 20, 1981). [Note: Figure 1 and Plate 1 were not included in the original copy.]

#### 17.8 State and Local Technical Records (continued)

2. Letter from William J. St. Hilaire, Massachusetts Department of Environmental Quality Engineering to Connorstone Inc. and Carr Research Laboratory, Inc. (March 17, 1981). Concerning acknowledgement of receipt of a proposal recommending corrective actions at the Nyanza site.
3. Memorandum from John Fitzgerald, Massachusetts Department of Environmental Quality Engineering to File (March 27, 1981). Concerning Phase I field testing at the Nyanza Chemical Waste Dump in Ashland, Massachusetts.
4. Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (May 8, 1981). Concerning attached additional materials to assist the DEQE in evaluation of the screened testing list.
5. Letter from George F. Connors, Jr., Connorstone, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (December 24, 1981). Concerning deep monitor well installation, Nyanza site, Ashland, Massachusetts.
6. "Nyanza Chemical Interceptor - Ashland, Massachusetts - Design Documentation," Connorstone, Inc. (January 8, 1982).
7. "Discussion Document - Research Options on Wide Area Mercury and Selenium Pollution Near the Nyanza Chemical Waste Dump, Ashland, Massachusetts," Carr Research Laboratory, Inc. (February 5, 1982).
8. Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to William St. Hilaire, Massachusetts Department of Environmental Quality Engineering (February 12, 1982). Concerning comments on DEQE's draft approval of the deep drilling program, with attached "Discussion Document".
9. Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to Mary Sanderson, EPA Region I (March 18, 1982). Concerning transmittal of attached draft report entitled "Pollution Evaluation During the Low Water Table Season on the Nyanza Chemical Waste Dump, Ashland, Mass.," Carr Research Laboratory, Inc. and Connorstone, Inc. for MCL Development Corporation (March 3, 1982).

#### 17.8 State and Local Technical Records (continued)

10. Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (May 6, 1982). Concerning issues regarding field techniques used by Carr Research Laboratory, Inc.
11. "Nyanza Chemical Waste Dump, Ashland, Massachusetts - Discussion Document," John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (August 6, 1982). Concerning quality control at the Nyanza site.
12. Letter from Jerome B. Carr, Carr Research Laboratory, Inc. to John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (December 20, 1982). Concerning quality control at the Nyanza site.
13. Memorandum for the Record from John Fitzgerald, Massachusetts Department of Environmental Quality Engineering (February 1, 1983). Concerning the State-EPA Superfund contract for the Nyanza site.

**Section II**  
**Guidance Documents**

**NYANZA CHEMICAL  
NPL SITE ADMINISTRATIVE RECORD  
GUIDANCE DOCUMENTS**

EPA guidance documents may be reviewed at EPA Region I, Boston, Massachusetts.

**General EPA Guidance Documents**

1. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Community Relations in Superfund: A Handbook (Interim Version) (EPA/HW-6), September 1983. [C017]
2. U.S. Environmental Protection Agency. Office of Ground Water Protection. Ground Water Protection Strategy, August 1984. [2403]
3. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation and Liability Act) (EPA/540/G-85/003), June 1985. [C034]
4. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Remedial Investigations under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/002), June 1985. [C035]
5. U.S. Environmental Protection Agency. National Oil and Hazardous Substance Contingency Plan (NCP), July 16, 1982. [C063]
6. U.S. Environmental Protection Agency. Procedures for Planning and Implementing Off-site Response Actions. (Memorandum from Jack W. McGraw), May 6, 1985. [C059]